

# *UVIR Research Institute*

Division Of Reykdal-Smith Enterprises, LLC

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**PRESENTATION OF  
DONALD L. SMITH  
EXECUTIVE DIRECTOR  
UVIR RESEARCH INSTITUTE  
BEFORE THE  
NATIONAL TOXICOLOGY PROGRAM (NTP)**

**January 27, 2004**

**Lister Hill Center Auditorium (Building 38A)  
National Library of Medicine  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, Maryland, 20892.**

**UVIR = Ultraviolet, Visible and Infrared electromagnetic Radiation.**

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Good morning. My name is Donald L. Smith and I am the Director of Research at the UVIR Research Institute in Tucson, Arizona, an organization studying the biological effects of ultraviolet, visible and infrared electromagnetic radiation.

It is my opinion that the primary weakness of the Report on Carcinogens (RoC) is that it *errs fundamentally* when (a) it *relies upon the outmoded and scientifically unsupportable* “Linear Non-Threshold” (LNT) hazard assessment method (which assumes that because an “agent, substance or mixture” (ASM) is hazardous at a specific dose, it is hazardous at any other dose) for evaluating potential listings; (b) it *fails to mention* the beneficial effects of an “agent, substance or mixture” (ASM) when that ASM has both beneficial and harmful effects and this failure is especially misleading and potentially damaging to the American public when the ASM (like, for instance, ultraviolet radiation) is essential for survival of life on earth.

It is *wholly irresponsible* for any federal scientific body (NTP) and quasi-health agency (NIEHS) *to omit* from a document (the RoC) purporting to assess the harmful effect (or effects) of an ASM on the human body, a detailed discussion of the beneficial effect (or effects) of the ASM on the human body when the ASM is known to have both harmful and beneficial effects.

Thus, if the RoC is to warn the American public accurately about the health implications of an ASM that has both beneficial and harmful effects (like ultraviolet radiation), it must be sure not only to warn them about the *harmful effects* of the ASM but also to inform them about the *beneficial effects* of the ASM. To do otherwise renders the RoC *incomplete and misleading* because it will not, *equally and fairly*, present *both sides* of the risks involved to the American public.

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